

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF TIFFANY R. ELLIS
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Roopal P. Luhana, declare:

1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated confidential by Uber, Plaintiffs filed the following under seal:

Document	Description	Designating Party
Portions of Plaintiffs' Letter Regarding Defendants' Responses to Plaintiffs' Bellwether Discovery Requests	References to information deemed confidential	Uber
Exhibit 1 to Plaintiffs' Letter Regarding Defendants' Responses to Plaintiffs' Bellwether Discovery Requests	References to information deemed confidential	Uber

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 26th day of May, 2025 in Brooklyn, New York.
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5 /s/ Roopal P. Luhana
6 Roopal P. Luhana
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